UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DOW JONES & COMPANY, INC., Plaintiff, v. ABLAISE LTD. and GENERAL INVENTIONS INSTITUTE A, INC. Defendants.	Civil Action No. 1:06-CV-01014 Judge James Robertson
DOW JONES REUTERS BUSINESS INTERACTIVE, LLC d/b/a FACTIVA, Plaintiff, v. ABLAISE LTD. and GENERAL INVENTIONS INSTITUTE A, INC. Defendants.	Civil Action No. 1:06-CV-01015 Judge James Robertson

PLAINTIFFS' MOTION FOR LEAVE TO REMOVE DOCUMENT FROM PUBLIC ACCESS AND REFILE UNDER SEAL

Plaintiffs, Dow Jones & Company, Inc. and Dow Jones Reuters Business Interactive, LLC d/b/a Factiva (collectively, "Dow Jones"), by their attorneys, submit this motion to convey to the Court Ablaise's demand that Dow Jones' Opposition to Defendant Ablaise, Ltd.'s Motion to Dismiss the '530 Patent be removed from the publicly accessible docket and refiled under seal.

On August 11, 2008, Dow Jones filed its Opposition and exhibits thereto. Because two of the exhibits cited were designated by Ablaise as "confidential," Dow Jones filed those exhibits under seal and omitted them from the electronically filed version of the Opposition. The Opposition itself, however, was not filed under seal because, in Dow Jones' view, it did not convey any information from the Ablaise documents that could reasonably be viewed as "confidential." The sole references in the Opposition to the Ablaise documents are two minor quotes from one of the documents as to Ablaise's general views as to the nature of its licensing program and the number of potentially infringing websites.[1] Dow Jones does not believe these quotes justify placing the Opposition under seal, particularly since Ablaise was publicly asserting to numerous targets during that timeframe its position that commonly-used website technology infringed the Ablaise patents.

After the Opposition was filed, Ablaise wrote to Dow Jones and insisted that it believes the Opposition must be filed under seal and removed from the public docket because of these quotes. Dow Jones does not believe that the quotes at issue meet the standard for confidential information that would warrant filing under seal. Ablaise has not explained why the quoted material (as opposed to the underlying document) should be treated as "confidential." However, in light of Ablaise's insistence that the Protective Order required that Dow Jones file its Opposition under seal and that Dow Jones must move to place the Opposition under seal, Dow Jones submits this Motion.

[1] Dow Jones does not repeat the quotes herein because to do so would, in Ablaise's view, require that this motion itself be filed under seal. The quotes at issue are on page 3 and cite to Exhibit 5.

Date: August 12, 2008

Respectfully submitted,

By: /s/

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Attorneys for Plaintiffs, Dow Jones & Company, Inc. and Dow Jones Reuters Business Interactive, LLC d/b/a Factiva

CERTIFICATE OF SERVICE

I hereby certify, that on this 12th day of August, 2008, I electronically filed with the Clerk of the Court, **PLAINTIFFS' MOTION FOR LEAVE TO REMOVE DOCUMENT FROM PUBLIC ACCESS AND REFILE UNDER SEAL** using the CM/ECF system and have served all parties in the manner described below to the following:

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